

BLANK ROME LLP
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Thomas H. Belknap, Jr. (TB-3188)
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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MITTAL STEEL NORTH AMERICA.,

Plaintiff,

-against-

M/V “FONTHIDA NAREE, her engines,
boilers, etc., WESTERN BULK SHIPPING ASA,
WESTERN BULK CARRIERS HOLDING ASA,
WESTERN BULK CARRIERS AS, and
PRECIOUS CITIES, LTD.,
Defendants.

07 Civ. 10587 (DLC)

ECF Case

ANSWER TO CROSS CLAIM

Defendant PRECIOUS CITIES, LTD. (“PCL” or “Defendant”), by its attorneys Blank Rome LLP, as and for its response to the Answer with Affirmative Defenses and Cross Claim of Defendants WESTERN BULK SHIPPING ASA, WESTERN BULK CARRIERS HOLDING ASA, WESTERN BULK CARRIERS AS (collectively the “Western Bulk Defendants”) dated January 25, 2008 (the “Cross Claim”), alleges as follows:

1. PCL repeats and realleges each and every affirmative defense contained in its Answer dated February 12, 2008 as if set forth herein in full.
2. Paragraphs 1 through 25 of the Cross Claim require no response from PCL, but to the extent a response is required, denies the allegations contained therein.
3. Admits the allegations contained in paragraph 26 of Cross Claim.

4. Denies knowledge or information sufficient to form a belief as to the truth of the allegations contained in paragraph 27 of the Cross Claim.

5. Admits the allegations contained in paragraph 28 of the Cross Claim.

6. Denies the allegations contained in paragraph 29 of the Cross Claim.

7. Denies the allegations contained in paragraph 30 of the Cross Claim.

WHEREFORE, Defendant PCL prays that the Court:

- a. Dismiss the Verified Complaint herein against it;
- b. Dismiss the Western Bulk Defendants' Cross Claim;
- c. Grant PCL's Cross Claim; and
- d. Grant such other and further relief as may be just or equitable.

Dated: New York, New York
February 20, 2008

Respectfully Submitted,

BLANK ROME LLP

/s/

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